

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Kevin Y. Teruya (Bar No. 235916)
kevinteruya@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000

HAGENS BERMAN SOBOL SHAPIRO LLP
Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com
715 Hearst Avenue, Suite 300
Berkeley, CA 94710
Telephone: (510) 725-3000

Interim Co-Lead Consumer Class Counsel

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

This Document Relates To: All Consumer
Actions

Consolidated Case No. 3:20-cv-08570-JD

**CONSUMER PLAINTIFFS' NOTICE OF
COMPELLED ELECTION OF EXPERT
ECONOMIST REGARDING MARKET
DEFINITION AND MARKET POWER**

The Hon. James Donato

1 The Court's minute order compels Consumer Plaintiffs to identify one expert economist to
2 opine on market definition and market power. ECF No. 853. In response to the Court's order,
3 Consumer Plaintiffs identify Dr. Joseph Farrell as their expert economist to affirmatively opine on
4 market definition and power.¹

5 Consumer Plaintiffs respectfully note and preserve their objection to the Court's order and
6 other rulings that limit their exhibits and experts for class certification, summary judgment, and trial.
7 They submit that this case and these motions should be decided based on the full record, including
8 Consumer Plaintiffs' merits expert reports (including all the market definition and power opinions of
9 both Dr. Economides and Dr. Farrell), all of which were disclosed to Facebook in early 2024 and
10 were the subject of expert depositions by Facebook.

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28 ¹ Consumer Plaintiffs understand that pursuant to the Court's orders, Facebook will be permitted
two economics experts—Dr. Carlton and Dr. List—to opine on relevant market and power issues.

1 DATED: November 22, 2024

2 By: /s/ Shana E. Scarlett

3 **HAGENS BERMAN SOBOL SHAPIRO LLP**

4 Shana E. Scarlett (Bar No. 217895)

5 shanas@hbsslaw.com

6 715 Hearst Avenue, Suite 202

7 Berkeley, CA 94710

8 (510) 725-3000

9 Steve W. Berman (admitted *pro hac vice*)

10 steve@hbsslaw.com

11 1301 Second Avenue, Suite 2000

12 Seattle, WA 98101

13 (206) 623-7292

14 *Interim Co-Lead Consumer Class Counsel*

15 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

16 W. Joseph Bruckner (admitted *pro hac*
17 *vice*)

18 wjbruckner@locklaw.com

19 Robert K. Shelquist (admitted *pro hac*
20 *vice*)

21 rkshelquist@locklaw.com

22 Brian D. Clark (admitted *pro hac vice*)

23 bdclark@locklaw.com

24 Rebecca A. Peterson (Bar No. 241858)

25 rapeterson@locklaw.com

26 Kyle Pozan (admitted *pro hac vice*)

27 kjpozan@locklaw.com

28 Laura M. Matson (admitted *pro hac vice*)

lmmatson@locklaw.com

100 Washington Avenue South, Suite
2200

Minneapolis, MN 55401

(612) 339-6900

Interim Counsel for the Consumer Class

By: /s/ Kevin Y. Teruya

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin Y. Teruya (Bar No. 235916)

kevinteruya@quinnemanuel.com

Adam B. Wolfson (Bar No. 262125)

adamwolfson@quinnemanuel.com

Scott L. Watson (Bar No. 219147)

scottwatson@quinnemanuel.com

Claire D. Hausman (Bar No. 282091)

clairehausman@quinnemanuel.com

Brantley I. Pepperman (Bar No. 322057)

brantleypepperman@quinnemanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017-2543

(213) 443-3000

Michelle Schmit (admitted *pro hac vice*)

michelleschmit@quinnemanuel.com

191 N. Wacker Drive, Suite 2700

Chicago, IL 60606-1881

(312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)

manishasheth@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

(212) 849-7000

Interim Co-Lead Consumer Class Counsel

ATTESTATION OF SHANA E. SCARLETT

This document is being filed through the Electronic Case Filing (ECF) system by attorney Shana E. Scarlett. By her signature, Ms. Scarlett attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

DATED: November 22, 2024

By /s/ Shana E. Scarlett
Shana E. Scarlett

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November 2024, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing it to be electronically served on all attorneys of record.

By /s/ Shana E. Scarlett
Shana E. Scarlett